Carol Lumb - Tukwila SMP Comments

From: "Thomson, Gordon"

To: "Lumb, Carol"

Date: 10/08/2008 1:27 PM

Subject: Tukwila SMP Comments

EXHIBIT 34 DATE 10/9/08

PROJECT NAME

Carol,

Below is our response to the City's SMP. I'll use this as a basis for my comments at tomorrow's meeting. Let me know if you have any questions.

Thanks

Gordon

Dear Ms. Lumb.

I am writing on behalf of the Green/Duwamish and Central Puget Sound watershed (WRIA 9) in support of the City of Tukwila's Draft Shoreline Master Program (SMP). Local SMP's are an essential element in the goal established by the State Legislature and the Puget Sound Partnership of restoring Puget Sound by 2020, and in the recovery of Puget Sound Chinook salmon, listed as threatened under the Endangered Species Act in 1999. The WRIA 9 Chinook Salmon Recovery Plan is a chapter in the Federal Puget Sound Chinook Recovery Plan adopted by NOAA in 2007. Protection of existing resources and restoration of essential watershed resources is key to implementing the WRIA 9 Plan. Tukwila's draft SMP will go a long way to supporting the protection and restoration essential to Chinook salmon recovery in WRIA 9.

Tukwila is located within the Duwamish transition zone (i.e. fresh water/salt water mixing zone) where juvenile salmon osmoregulate to survive in salt water. The Duwamish transition zone is the high priority protection and restoration area within WRIA 9. We know from the extensive ecological economics evaluation done in support of the WRIA 9 Plan that protection and restoration investments made in the urban area provide valuable ecological goods and services at a lower cost than engineered solutions such as storm water facilities. It is therefore essential that shoreline regulations provide opportunities for buffers, riparian vegetation, levee setbacks, and low impact development (e.g. pervious pavement). It is for these reasons that WRIA 9 supports the draft SMP.

Specifically, WRIA 9 supports the new development site location requirement in section 9.2 and the flood hazard reduction requirements in section 9.5. Reducing the amount of shoreline armoring will provide opportunities for shallow water habitat and riparian planting. Section 9.6 addresses this by stating that Shoreline protection shall not be considered an outright permitted use and shall be permitted only when it has been demonstrated through a Riverbank Analysis and Report that shoreline protection is necessary for the protection of existing legally established structures and public improvements.

We support the off street parking and loading requirements in section 9.9. We note, however, under the exceptions in sub section B that low impact development provisions such as pervious pavement should be included.

We strongly support the buffer widths in section 10.9 (C) Wetland Watercourse, and Fish and Wildlife Habitat Conservation Area Buffers. Buffers that protect ESA listed species such as Chinook salmon are key to reducing the impacts of urban development on salmon and other watershed resources.

Finally, we strongly support the addition of section 3.2, Changes in Shoreline Jurisdiction due to Restoration. The ability to assure upland properties owners the range of uses allowed under the underlying

zoning without having to obtain a substantial development permit is essential to the successful construction of shoreline restoration projects that may relocate the ordinary high water mark.

Thank you for the opportunity to comment on the draft SMP.

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